

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-10-036

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)(1),
960(a)(1), and
960(b)(1)(B)(ii))

DOROTHY SEARS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ROBERT BUONASPIN^{RB}, being duly sworn, deposes and states that he is a Special Agent of United States Immigration and Customs Enforcement ("ICE"), duly appointed according to law and acting as such.

Upon information and belief, on or about January 12, 2010, within the Eastern District of New York and elsewhere, the defendant DOROTHY SEARS, did knowingly and intentionally import a controlled substance into the United States from a place outside thereof, which offense involved five kilograms or more of a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a), 960(a)(1) and 960(b)(1)(B)(ii); Title 18, United States Code, Sections 2 and 3551 et seq.)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent of ICE, duly appointed according to law and acting as such. I have been a special agent for over two years and am currently assigned to the John F. Kennedy International Airport ("JFK") Office. During my tenure with ICE, I have participated in numerous narcotics investigations during the course of which I have (a) conducted physical surveillance of suspected drug traffickers; (b) executed search warrants; (c) reviewed and analyzed numerous taped conversations of individuals involved in drug trafficking; and (d) debriefed cooperating witness drug traffickers.

2. On or about January 12, 2010, Customs and Border Protection ("CBP") officers were conducting a border examination of baggage being off-loaded from Delta Airlines flight 384 which had arrived at John F. Kennedy International Airport ("JFK") from Georgetown, Guyana. During that inspection, a canine trained in detecting narcotic substances reacted to a pink suitcase with an orange ribbon which was ticketed to the defendant DOROTHY SEARS. That suitcase was subsequently opened and found to contain approximately 24 kilograms of a substance which field tested

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

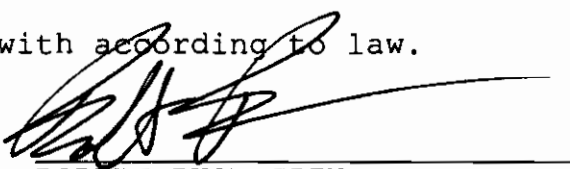
positive for cocaine.

3. During a customs examination of the defendant DOROTHY SEARS's about her carry-on luggage, the defendant, who was nervous, sweating profusely and avoiding eye contact, was asked by CBP officers if she had checked any baggage in Guyana and she initially responded no. A pat-down search was then conducted of the defendant DOROTHY SEARS's person and a hard object was found concealed in the defendant's bra. The hard object was found to be a plastic bag containing a green leafy substance. The defendant DOROTHY SEARS then admitted that she had checked a pink suitcase with an orange ribbon. The defendant subsequently identified the suitcase that contained the cocaine as the suitcase that she had checked in Guyana. The defendant also stated that she had been instructed by an individual in Guyana not to pick the bag up. The green leafy substance was then field tested and the results indicated that the substance contained marijuana.

4. The defendant DOROTHY SEARS was subsequently placed under arrest. After having been advised of her Miranda warnings, the defendant stated in sum and substance and in part, that she was to be paid \$6,000 in U.S. currency for checking in the suitcase by an individual in Guyana when she returned to that country. The defendant also reiterated that she had been instructed not to retrieve the bag at J.F.K. The defendant DOROTHY SEARS further stated that she thought the suitcase was

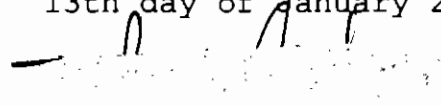
going to contain marijuana. However, after she received the suitcase, she believed that the suitcase contained cocaine because of the weight of the suitcase and the amount of money she was being paid.

WHEREFORE, your deponent respectfully requests that the defendant DOROTHY SEARS be dealt with according to law.



ROBERT BUONASPINA
Special Agent
Immigration and Customs
Enforcement

Sworn to before me this
13th day of January 2010



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